

**PX 14**

**DECLARATION OF MARK JOYNER**

**PURSUANT TO 28 U.S.C. § 1746**

I, Mark Joyner, have personal knowledge of the facts and matters set forth below. If called as a witness, I could and would testify as follows:

1. I am over the age of 18 years old and am employed as an Investigator with the Federal Trade Commission's ("FTC") Division of Marketing Practices. My work address is FTC Headquarters, 600 Pennsylvania Ave NW, Washington, DC 20580. I have personal knowledge of the facts stated in this declaration and, if called as a witness, I would testify to the facts set forth below.
2. On September 18, 2024, the FTC filed a civil enforcement action in the United States District Court for Eastern District of Pennsylvania ("the court") against Ecommerce Empire Builders, and Peter Prusinowski ("Prusinowski").
3. On September 20, 2024, the court entered a temporary restraining order ("TRO").

**PRUSINOWSKIS' FINANCIAL DISCLOSURES**

4. On September 25, 2024, Prusinowski submitted the *Federal Trade Commission Financial Statement of Individual Defendants* forms and signed the forms under penalty of perjury.
5. The disclosures were incomplete, and Prusinowski stated the following excuses for multiple entries:
  - a. "This information is believed to be in the possession of the company's accounting firm. Mr. Prusinowski and counsel have each requested this information several times since the TRO's entry but it has not yet been provided."
  - b. "Because Mr. Prusinowski has no access to this account (after the TRO's entry, the Receiver assumed access and changed the log in and password information), Mr. Prusinowski is not able to identify the current balance at this time."
6. Prusinowski provided an email update to his financial disclosures on October 24, 2024.

7. Below is a summary of the best estimate of Prusinowski's initial personal financial disclosure, email update, and responses from financial institutions:

| Name on Account   | Financial Institution                  | Account Number | Current Balance                    |
|-------------------|--|----------------|------------------------------------|
| Peter Prusinowski | Coinbase                               | 36d8           | \$25,077.41                        |
| Peter Prusinowski | American United Life Insurance Company | 9440           | \$197,853.25 cash surrender value  |
| Peter Prusinowski | Safe Deposit Box                       | N/A            | 3 Rolex Watches- \$31,650          |
| Peter Prusinowski | Safe Deposit Box                       | N/A            | Gold and Silver Bullion- \$115,000 |
| Peter Prusinowski | 1935 Oakmont Ct Jamison, PA 18929      | N/A            | 1 Rolex Watch- \$12,000            |
| Peter Prusinowski | N/A                                    | N/A            | \$15,000 month after taxes salary  |
| Peter Prusinowski | TD Bank                                | 4093           | \$4,259.63                         |
| Peter Prusinowski | TD Bank                                | 9904           | \$15,432.17                        |
| Peter Prusinowski | TD Bank                                | 9386           | \$2,040.64                         |
| Peter Prusinowski | Acorns, Security, LLC                  | N/A            | Approximately \$100,000            |
| Peter Prusinowski | Fundrise Real Estate Investment Trust  | N/A            | Approximately \$20,000             |
| Peter Prusinowski | Fidelity Investments HSA Account       | N/A            | Approximately \$5,000              |
| Peter Prusinowski | Lofty.AI                               | N/A            | \$500.00                           |

|                   |                           |     |                            |
|-------------------|---------------------------|-----|----------------------------|
| Peter Prusinowski | Bettlement<br>Securities  | N/A | Approximately<br>\$10,000  |
| Peter Prusinowski | Capital<br>One/Amerifunds | N/A | Approximately<br>\$200,000 |

8. From this information, I estimate that Prusinowski has approximately \$753,542.46 in personal assets frozen.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 24, 2024, in Washington, DC

/s/ Mark Joyner

Mark Joyner